IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

BEST WESTERN INTERNATIONAL, INC., a non-profit Arizona corporation,

Plaintiff,

v.

JOHN DOE, an Internet website administrator; JANE DOES 1-X, Internet website bloggers and Members of Best Western International, Inc.; JOHN DOES 1-X, Internet website bloggers and Governors of Best Western International, Inc.,

Defendants.

| U.S. District Court for the | |
|-----------------------------|--|
| District of Delaware | |
| Misc. Case No. | |

U.S. District Court for the District of Arizona Case No. 2:06-cv-01537-DGC

> U. S. DISTRICT COURT - DE MISC. CASE #_ 06-219

DEFENDANT JANE DOE 1'S MOTION TO QUASH SUBPOENA DUCES TECUM DIRECTED TO NON-PARTY WITNESS L.N.H., INC. AND FOR A PROTECTIVE ORDER

NOW COMES Defendant Jane Doe 1, by and through its undersigned counsel, and hereby moves this Honorable Court for an order quashing a subpoena issued under the auspices of this Court and directed to a third-party witness, L.N.H., Inc. and for a protective order against further attempts to obtain the requested discovery. A form of order is attached hereto as Exhibit A. This motion is supported by the contemporaneously filed Brief in Support.

OF COUNSEL:

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James M. Kron (I.D. No. 3898)

By William R. Sum

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Dated: December 11, 2006

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 ${\it Attorneys for Defendant Jane Doe 1}$

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| BEST WESTERN INTERNATIONAL, INC., a non-profit Arizona corporation, Plaintiff, v. JOHN DOE, an Internet website administrator; JANE DOES 1-X, Internet website bloggers and Members of Best Western International, Inc.; JOHN DOES 1-X, Internet website bloggers and Governors of Best Western International, Inc., | U.S. District Court for the District of Delaware Misc. Case No. U.S. District Court for the District of Arizona Case No. 2:06-cv-01537-DGC | | |
|---|---|--|--|
| Defendants. | | | |
| ORDER The Court, having considered Defendant Jane Doe 1's Motion to Quash Subpoens Duces Tecum Directed To Non-Party Witness L.N.H., Inc. And For A Protective Order, | | | |
| IT IS HEREBY ORDERED this day of, | | | |
| 2006 that the motion is GRANTED, and that: | | | |
| 1) The Subpoena of L.N.H., Inc. attached as Exhibit 2 to the Declaration of | | | |
| William R. Denny is hereby QUASHED; and | | | |
| 2) Plaintiff shall make no further attempts to obtain the discovery sought in | | | |
| the subpoena attached as Exhibit 1 to the Declaration of William R. Denny. | | | |
| | | | |
| United States District Judge | | | |

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that, on this 11th day of

December 2006, a copy of Defendant Jane Doe 1's Motion to Quash Subpoena *Duces Tecum*Directed to Non-Party Witness L.N.H., Inc. and for a Protective Order was served by first class mail, postage prepaid, upon the following persons:

Cynthia A. Ricketts, Esquire Sara K. Regan, Esquire Squire, Sanders & Dempsey L.L.P. Two Renaissance Square 40 North Central Avenue, Suite 2700 Phoenix, AZ 85004-4498

L.N.H., Inc. 260 Chapman Road, Suite 205 Newark, DE 19702

William R. Denny (ID No. 2580)